

CONSUMER LITIGATION ASSOCIATES

ATTORNEYS AND COUNSELORS AT LAW

A PROFESSIONAL CORPORATION

HAMPTON ROADS OFFICE:

763 J. Clyde Morris Blvd., Suite 1-A
Newport News, Virginia 23601

NORTHERN VIRGINIA OFFICE:

1800 Diagonal Road
Alexandria, Virginia 22314

Leonard A Bennett, Esquire
lenbennett@clalegal.com
(757) 930-3660 Phone
(757) 930-3662 Facsimile

REPLY TO: HAMPTON ROADS OFFICE

RE: JAMES RYALS, et al v. HIRERIGHT SOLUTIONS, INC., et al

STATEMENT FOR SERVICES RENDERED

May, 2008

Len Bennett: Conference w/Chris North & Matt Erausquin regarding USIS.

1.0 hour

Matt Erausquin: Initial conference with L. Bennett and C. North regarding possible litigation against USIS.

1.0 hour

August, 2008

Len Bennett: Telephone conference with Matt Dooley (Ohio counsel) regarding litigation against USIS. Review documents prior to proceeding with litigation.

5.50 hour

Matt Erausquin: Telephone conference with M. Dooley regarding litigation against USIS.

.50 hour

November, 2008

Len Bennett: Consult w/Chris North regarding meeting with Plaintiff in Hampton, VA and discussion regarding proceeding with litigation.

.50 hours

December, 2008

Len Bennett: Meet w/Chris North and Matt Erausquin regarding Washington, D.C. co-counsel.

.50 hours

Matt Erausquin: Conference with L. Bennett and C. North to discuss proposed Washington D.C. co-counsel and the proposed complaint to be filed.

.50 hour

January, 2009

Len Bennett: Telephone conference w/D.C. co-counsel.

.50 hours

Matt Erausquin: Telephone conference with proposed Washington D.C. co-counsel and the proposed complaint to be filed.

.50 hour

March, 2009

Len Bennett: Received and Reviewed detailed e-mail from C. North together with pleadings drafted by C. North.

1.0 hours

Matt Erausquin: Read and reviewed e-mail from C. North regarding each firm's participation and role in the upcoming case.

0.50 hour

April, 2009

Len Bennett: Discussions with Ohio counsel; emails/send Ohio counsel documents through sharefile, depositions, determine subclasses, appropriate class representatives and roles of lead counsel.

7.25 hours

May, 2009

Len Bennett: Received and Reviewed memorandum from C. North regarding meeting with Richmond residents with claims for discharge from Greyhound whose consumer reports were prepared by USIS. Discussion w/C. North regarding same.

1.0 hours

June, 2009

Len Bennett: Conference calls; emails with Ohio counsel and C. North regarding litigation strategy.

2.5 hours

July, 2009

Len Bennett: Conference calls w/Ohio counsel and C. North regarding additional litigation pleadings; review/send emails from/to C. North and Matt Erausquin;

3.75 hours

Matt Erausquin: Telephone conference with Ohio counsel, L. Bennett, and C. North regarding class action litigation pleadings and strategy; e-mail correspondence with L. Bennett and C. North regarding role of counsel and list of potential Plaintiffs obtained by Ohio counsel from USIS in other litigation proceedings; commence review of USIS documents for potential representatives located in Richmond; draft, review and edit letters to potential representatives; mailing of letters.

5.0 hours

August, 2009

Len Bennett: Review list of 130 individuals with Virginia addresses that were subject of negative reports prepared by USIS; work with Ohio counsel to prepare potential clients for Virginia; memo to C. North regarding alternatives for proceeding with litigation and adding new class reps from database provided by Ohio counsel; review correspondence from Ohio counsel.

8.5 hours

Matt Erausquin: Receipt and review of list from Ohio Counsel containing potential clients in Eastern Virginia who were subject to USIS prepared consumer reports resulting in a negative report being forwarded to potential employers; conferred and drafted memorandum with L. Bennett regarding alternatives for proceeding such as including new class representatives and potential solicitation of new individual cases; receipt and review of subsequent lists with more Eastern Virginia potential clients; ongoing correspondence with Ohio counsel regarding generation of potential clients and class list.

4.75 hours

September, 2009

Len Bennett: Email exchanges w/Matt Dooley, C. North; review memo from C. North regarding eliminating people from the list; discussion with Ohio counsel; finalize complaint.

6.75 hours

Matt Erausquin: Ongoing correspondence with Ohio counsel regarding generation of potential clients and class list; begin communicating with numerous potential class representatives and participants; receipt and review of e-mails from C. North identifying Greyhound plaintiffs to serve as class rep and confirming retainer of new clients; begin drafting, editing, and revising Ryals v. HireRight Solutions, Inc. individual complaint; confer with L. Bennett and C. North regarding Complaint.

15 hours

October, 2009

Len Bennett: Review final complaint; conference call w/C. North regarding participation in other class actions- Wisconsin claim against HireRight and filing individual cases; discussions with C. North regarding the toll free number to USIS and phone calls that he received from other individuals.

3.25 hours

Matt Erausquin: Edit, revise, and finalize Complaint with L. Bennett and C. North; file complaint; work on co-counsel agreement; review and respond to e-mail correspondence regarding complaint and co-counseling agreement.

9.25 hours

November, 2009

Matt Erausquin: Continue working on and revising co-counsel agreement; review and respond to e-mail correspondence.

6.5 hours

December, 2009

Len Bennett: Email exchanges with C. North/Matt Erausquin regarding venue; Review list of Virginia individuals with negative reports; discussions with C. North regarding class reps.

2.25 hours

Matt Erausquin: Receipt and review list of Eastern Virginia potential clients for whom HireRight Solutions prepared negative reports in Feb. 2008; begin attempting to establish contact with those individuals who reside in the Richmond area; participate in e-mail exchange between L. Bennett and C. North regarding venue for case; continue information gathering from potential class representatives via telephone.

7.0 hours

January, 2010

Len Bennett: Prepare list of potential class reps; prepare Smith FCRA complaint; discussions with C. North and Matt Erausquin; Email exchanges w/C. North/Matt Erausquin/Ohio counsel; work with C. North in drafting Amended Class Complaint; Review HireRight's background checks.

23 hours

Matt Erausquin: Continue client information gathering and screening of potential class representatives; confer with L. Bennett and C. North via e-mail regarding case strategy; receipt and review of proposed joint prosecution agreement between Ohio and Virginia counsel and participation in/review of email exchange between parties regarding the same; begin drafting Ryals Amended Class Complaint; continue drafting, editing, and revising Amended Class Complaint including ensuring all claims applied to at least one plaintiff and correcting claims that did not apply to certain plaintiffs; finalize Amended Class Complaint against HireRight Solutions et al. Review and respond to email correspondence.

26.5 hours

February, 2010

Len Bennett: Email regarding improper service of USIS; review Motions for Extension to file Response to First Amended Complaint.

.25 hours

Matt Erausquin: Enter notice of appearance for numerous Plaintiffs; review and respond to email correspondence.

4.25 hours

March, 2010

Matt Erausquin: Receipt and review of scheduling order; review and respond to email correspondence.

2 hours

April, 2010

Len Bennett: Review letter from Bowman regarding wrong entity; email exchange w/C. North; telephone conference w/C. North, Matt Erausquin and Ohio counsel regarding discovery issues; Email exchange w/Bowman; review Defendant's 26a(1)s; review answers and motions filed by Defendant; review and calendar dates from scheduling order; prepare declaration of LAB; review others declarations; email exchanges w/ Bill Downing; prepare Opposition to Defendant's Motion to Dismiss and Motion for Summary Judgment; prepare opposition to Defendant's Motion to

Transfer case to Oklahoma; travel to/from Richmond to attend Pretrial.

37.25 hours

Matt Erausquin: Telephone conference with Ohio counsel, L. Bennett and C. North regarding several issues such as whether to seek time additional time to conduct FRCP 56 discovery and potential need for affidavits; receipt and review of motions filed by the defense including motion to dismiss and motion to transfer; confer with co-counsel regarding delegating responsibilities for response; begin drafting and producing FRCP 26(a)1 disclosures; confer with co-counsel about initial pre-trial conference; receipt and review of e-mail from C. North regarding class rep issues; prepared FRCP 26(a)(1) declaration with L. Bennett; begin drafting, editing, and revising Plaintiff's opposition to Defendants' motion to dismiss and Defendants' motion for summary judgment; pull and research case law for Plaintiff's memoranda; finalize Plaintiff's memoranda; begin drafting, editing, and revising memorandum in opposition to Defendant's motion to transfer to N.D. Oklahoma; review and respond to email correspondence.

27 hours

May, 2010

Len Bennett: Email exchanges and telephone conferences w/C. North, Bill Downing regarding punitive damages and amended complaint; prepare Reply and Response to Motion to Dismiss and Motion for Summary Judgment; research and draft responses to Motion to Transfer case and Motion for Summary Judgment.

59.5 hours

Matt Erausquin: Receipt and review of Defendants' reply to Plaintiffs' opposition to motion for Summary Judgment and Motion to Dismiss; continue researching and drafting responses to Motion to Transfer Venue and Motion for Summary Judgment relating to certain Defendants.

24.5 hours

June, 2010

Len Bennett: Discussions w/C. North regarding other cases against HireRight being transferred to Oklahoma; review spreadsheet of criminal records of Plaintiffs; telephone conference and emails w/Ohio counsel; review discovery received from Defendants.

25.25 hours

Matt Erausquin: Confer with L. Bennett and C. North regarding the Pennsylvania and New Jersey cases pending against HireRight that were transferred to Oklahoma; discussion of possible strategy to avoid transfer.

14.5 hours

July, 2010

Len Bennett: Receipt and review of Defendant's expert witness reports of Anne Fortney, Oscar Marquis & Bernard Siskin. TCs Ohio; Digest Hall depositions; TCs defense; Tcs PA; Doc review Hall; TCs hendrick and dearmond; memo experts; Bowman

67.25 hours

Matt Erausquin: Begin meeting and conferring with named Plaintiffs to prepare for depositions; review and respond to email correspondence.

14 hours

August, 2010

Len Bennett: Discussions with co-counsel regarding depositions; TCs defense; Bowman and davis; Discovery drafts; Defense Ints RFPs; Protective order review and negotiations; TC Dooley; prepare for depositions (deps later canceled and mediation scheduled); review deposition notices received from Defendants; review discovery from Defendants; TC Holloman; review subpoenas received from Defendants; email exchanges with C. North/Matt Erausquin; review documents/email received from C. North; TCs Judge Dohnal; draft of mediation statement; draft Motion for Stay pending mediation.

87.25 hours

Matt Erausquin: Receipt and review of Defendants' first set of interrogatories to each Plaintiff; participated in telephone conference with co-counsel and opposing Counsel; participated in discussions with opposing counsel to schedule Plaintiffs' depositions; meet with clients regarding deposition preparation; telephone conference with L. Bennett, Ohio Counsel, and PA Counsel regarding collaboration, case updates, strategies, etc; receipt and review of complete summaries of Plaintiffs' cases provided via e-mail from C. North; e-mail exchange with C. North regarding claim summaries; receipt and review of inquiry reports and other supporting documents identifying the trucking companies that pulled reports on named Plaintiffs sent via e-mailed

from C. North; begin preparation and drafting of Plaintiffs' mediation statement; drafted, reviewed, and revised Plaintiffs' Rule 26 Disclosure; participated in negotiations with opposing Counsel regarding joint protective order and motion to stay proceedings.

35.25 hours

September, 2010

Len Bennett: Preparation of Plaintiff's mediation statement; telephone calls/ emails w/C. North, Matt Erausquin; review mediation summaries; review power point for mediation; travel to/from OK; review correspondence from Ohio counsel; telephone calls w/Ohio counsel preparing for mediation; preparation for mediation; travel to/from PA and participate in mediation.

68.75 hours

Matt Erausquin: Assisted in preparation of descriptions of Plaintiffs individual damages, if any; reviewed pre-mediation statement prepared by HireRight; received and reviewed C. North's revised mediation summaries for Fuentes, Spence, and Jackson and first draft of Hill mediation summary; continued editing and revising of mediation statements; multiple telephone conferences with co-counsel regarding upcoming mediation; review and respond to email correspondence.

23.5 hours

October, 2010

Len Bennett: Review/prepare preparations for mediation; travel to/from D.C. and participation in mediation; review mediation summaries and enclosures; prepare final mediation statement; correspondence w/Ohio counsel; review Defendant's mediation statement.

68.25 hours

Matt Erausquin: Participated in mediation in D.C.; telephone conference calls between co-counsel. Receipt and review of HireRight's mediation statement and exhibits and C. North's summary of the same. Participated in negotiating decision to stay the proceedings with opposing counsel in preparation of proposed order; continued preparation and finalization of mediation statement; IT process and digest defense docs.

27 hours

November, 2010

Len Bennett: Travel to/from, preparation for and participation in mediation in D.C.

23.00 hours

Matt Erausquin: Participated in mediation in D.C.; telephone conference calls between co-counsel regarding protective order, mediation strategy, etc; review and respond to email correspondence.

9.75 hours

Susan M. Rotkis: Travel to/from, preparation for and participation in mediation in D.C. Read and update memos.

18.50 hours

December, 2010

Len Bennett: Email exchanges w/C. North; preparation for January mediation; conference call w/co-counsel; TCs mediator; to defense.

7.50 hours

Matt Erausquin: Continue settlement negotiations with mediator; telephone conference calls with co-counsel and mediator; review and respond to email correspondence.

10 hours

Susan M. Rotkis: tel con w/ co-counsel (C. North, J. Francis, D. Searles); review correspondence from E. Greene; assist prep for follow-on mediation.

2.5 hours

January, 2011

Len Bennett: Preparation of and participation in mediation in D.C.; travel; tcs defense; tcs cc.

36.25 hours

Matt Erausquin: Participate in mediation in D.C.; participate in telephone conference calls between co-counsel regarding mediation issues; assist in drafting, editing, and revising MOU with co-counsel; assist in drafting, editing, and revising draft settlement agreement; review and respond to email correspondence.

12 hours

Susan M. Rotkis: Collaborate w/co-counsel on mediation preparation; tel update w/chambers J. Williams law clerk D. Holloman & J. Dohnal.

2.0 hours

February, 2011

Len Bennett: Review Motion to Withdraw pending motions by both parties; draft of settlement agreement; telephone conferences regarding settlement.

23.50 hours

Matt Erausquin: Receipt and review of Defendants' motion to withdraw pending motions; continue drafting, editing, and revising settlement agreement; telephone conference calls with co-counsel regarding settlement agreement; review and respond to email correspondence.

2 hours

Susan M. Rotkis: Correspond/tel cons with court re: status; review Motion to Withdraw pending motions by both parties; assist in reviewing settlement agreement drafts; telephone conferences regarding settlement.

2.50 hours

March, 2011

Len Bennett: Review class summaries; correspondence w/Ohio counsel regarding mediation and class notices and individual claims.

3.25 hours

Matt Erausquin: Continue work on draft settlement agreement; meet with co-counsel to discuss issues relating to settlement agreement; conduct research on 4th Circuit case law regarding approval of class settlements; telephone conference calls with co-counsel regarding settlement process and strategy; review and respond to email correspondence.

11 hours

Susan M. Rotkis: Review drafts of class notices/definitions; update counsel of record including consolidation cases; draft RFPs for class administration; communicate with all counsel re: drafting and sending out RFPs, identify class administrators capable of administering notice & settlement if approved; review class settlement agreement proposed by opposing counsel; discuss competing draft agreements; set up tel cons w/Rust, RMS re: RFPs; send out RFPs; review settlement agreement drafts.

17.00 hours

April, 2011

Len Bennett: Preparation of Motion for Preliminary Approval of Settlement; TCs and email defense; TCs PA counsel; email cc;

22.75 hours

Matt Erausquin: Begin drafting motion and brief for preliminary approval of settlement; conduct research on preliminary approval of settlement and 4th Circuit standards for fairness of class action settlement; review, edit, and revise draft motion and brief for preliminary approval; telephone conference calls with co-counsel regarding preliminary approval of settlement issues; review and respond to email correspondence regarding settlement briefs; receipt and review of Statement of Sponsors from Stumphauzer.

11.5 hours

Susan M. Rotkis: Assist in reviewing and editing final settlement agreement drafts; coordinate & participate in telephone conferences regarding finalizing settlement agreement.

4.0 hours

May, 2011

Len Bennett: Preparation of Motion and Memorandum to Certify Class; edits to settlement agreement and send to co- counsel; correspondence w/Ohio counsel; class notice drafts.

27.25 hours

Matt Erausquin: Begin drafting class notice and related documents for final settlement approval; telephone conference calls with co-counsel regarding issues related to final approval of class action settlement; begin drafting motion to certify class and memo in support; conduct research regarding 4th Circuit law on certifying a class; review and respond to email correspondence regarding final approval of class action settlement.

16.25 hours

Susan M. Rotkis: Communicate with chambers (Scott Kelly & Susan Panella) re: status and scheduling status conference. Communicate with all counsel re: setting up for status con with the court. Assist in preparation for status con.

3.5 hours

June, 2011

Len Bennett: Telephone calls with defense and co-counsel regarding finalizing settlement; finalize Motion and Memo to Certify Class; attend status conference.

22.25 hours

Matt Erausquin: Continue drafting, editing, and revising motion and memo to certify class; continue reviewing and revising settlement agreement with co-counsel and opposing counsel; attend conference before Judge Gibney; review L. Bennett top 8 issues with HireRight changes; telephone conference calls with co-counsel regarding settlement agreement revisions and issues; review and respond to co-counsel emails regarding finalizing settlement agreement; finalize motion and memo to certify class for filing.

11.75 hours

Susan M. Rotkis: Review preliminary approval memo settlement and documents.

2.5 hours

July, 2011

Len Bennett: Prep hearing; TCs defense; email cc; Travel to/from and attend Preliminary Approval Hearing in Richmond; review proposed Order of Preliminary Approval; TC davis; email defense; tcs administrator; conf and tcs Towne bank; TCs PA counsel; notice changes; website edits.

24.25 hours

Matt Erausquin: Prepare for, travel to, and return from Richmond USDC for preliminary approval hearing; attend preliminary approval hearing before Judge Gibney in Richmond; assist in preparation for order of preliminary approval of class action settlement; assist in preparation and dissemination of notice of settlement to class members; review and respond to emails from co-counsel regarding preliminary approval hearing and approval of

class action settlement.

17.5 hours

Susan M. Rotkis: Draft agreed supplemental motion and order re: Accurant as source for addresses for missing class members. Coordinate with all counsel and inform the court.

2.75 hours

August, 2011

Len Bennett: TCs defense; email cc; tcs and emails admin; tcs Towne bank; TCs PA counsel; conf C North regarding inquiries; draft call response scripts; TCs class members.

11.5 hours

Susan M. Rotkis: Tel con w/S. Kelly from chambers re: status. Research status.

.25 hours

Matt Erausquin: Telephone calls and email correspondence with co-counsel regarding settlement issues such as objections, opt-outs, briefing, etc.

3 hours

September, 2011

Len Bennett: Preparation, review and revise Motion and Memo to Consolidate out of state cases; telephone calls with co-counsel ; correspondence from/to Ohio counsel; TCs PA; emails PA and Oklahoma; Tcs class members; TCs North; emails Skelly

7.75 hours

Matt Erausquin: Begin drafting motion to consolidate cases and memo in support; review, edit, and revise motion to consolidate cases and memo in support; finalize motion to consolidate cases and memo in support for filing; telephone conference call with co-counsel regarding allocating responsibilities and dividing objections between co-counsel; review and respond to co-counsel email correspondence regarding settlement issues.

6.75 hours

Susan M. Rotkis: Communication w/ S. Kelly re: status; review Pacer problems with docket entries with class member personal info; review docket for redaction.

1.25 hours

October, 2011

Len Bennett: Final approval memo; emails cc; Tcs defense; email bowman and davis; TCs administrator; Preparation of Motion for Preliminary Approval and Petition for Attorney fees; edits admin declarations; admin monthly; correspondence class members. Begin drafting, editing, and revising final approval motion and memo in support; conduct research on final approval of class action settlements; review and prepare class member objections to settlement; email correspondence between co-counsel regarding class member objections and opt-outs; finalize final approval motion and memo in support for filing; assist in drafting, reviewing, and finalizing motion for attorney fees and incentive payment and memo in support; field phone calls from class members regarding class action settlement issues.

36 hours

Matt Erausquin: TCs LAB; emails and review drafts.

4 hours

November, 2011

Len Bennett: Prepare for, travel to, and return from Richmond USDC for Fairness Hearing and final settlement approval; attend Fairness Hearing and final settlement approval; field phone calls from class members regarding class action settlement issues; review and respond to co-counsel email correspondence regarding final approval of settlement and related issues; supplemental memo.

16.5 hours

Susan M. Rotkis: review all class administrator information; docket information; opt-out and objections; take calls from class members; draft motion and memo for final approval; communicate with counsel; circulate.

35.5 hours

Total hours (LAB): 732.75	@ \$475.00 per hour	\$ 348,056.25
Total hours (SMR): 73.50	@ \$350.00 per hour	\$25, 725.00
Total hours (MJE): 364.50	@ \$400.00 per hour	\$ 145,800.00
Estimated Total hours Paralegals: 300.00	@ \$150.00 per hour	\$45,000.00

Travel expenses: \$ 4,679.26
Federal Express: \$ 350.31
Mediation Expenses (Resolutions, Inc.) \$ 29,475.56
Parking expenses: \$ 90.00
Court Reporter (Marston Agency) \$ 1,425.00
Pro Hac Fees: \$ 150.00
Service fees: \$ 260.00
Expert Fees (Evan Hendricks and Elizabeth DeArmond) \$ 24,125.00
Doc scans, conversion \$ 12,218.50
Research (Westlaw) \$ 3,116.45

Fees: \$ 564,581.25
Costs: \$ 75,890.08